

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

THE CITY OF DETROIT, MICHIGAN

Debtor.

Case No. 13-53846

Chapter 9

Hon. Steven W. Rhodes

**JOINDER TO LIMITED OBJECTION TO DEBTOR'S MOTION FOR ENTRY OF AN
ORDER ESTABLISHING CASE MANAGEMENT AND SCHEDULING PROCEDURES**

U.S. Bank National Association ("U.S. Bank"), not individually but in its capacities as Trustee and Contract Administrator (collectively, the "Trustee") for the Series 2005 COPs (defined below) and the Series 2006 COPs (defined below), respectively, by and through its undersigned counsel, hereby joins in the *Limited Objection to Debtor's Motion for Entry of an Order Establishing Case Management and Scheduling Procedures* [Docket No. 85] (the "Limited Objection"). In support of this joinder, the Trustee respectfully states as follows:

1. U.S. Bank serves as (i) Trustee under that certain Trust Agreement, dated June 2, 2005, by and among the Detroit General Retirement System Service Corporation (the "GRS Corporation"), the Detroit Police and Fire Retirement System Service Corporation (the "PFRS Corporation") and U.S. Bank, and as Contract Administrator under that certain Contract Administration Agreement, dated June 2, 2005, by and among the Detroit Retirement Systems Funding Trust 2005 (the "2005 Funding Trust"), the GRS Corporation, the PFRS Corporation and U.S. Bank, in each case, regarding the issuance of Certificates of Participation Series 2005-A (the "Series 2005 COPs") and the transactions contemplated thereby; and (ii) Trustee under that certain Trust Agreement, dated June 12, 2006, by and among the GRS Corporation, the PFRS

Corporation and U.S. Bank, and as Contract Administrator under that certain Contract Administration Agreement, dated June 12, 2006, by and among the Detroit Retirement Systems Funding Trust 2006 (the “2006 Funding Trust”), the GRS Corporation, the PFRS Corporation and U.S. Bank, in each case, regarding the issuance of Certificates of Participation Series 2006-A and 2006-B by the 2006 Funding Trust (collectively, the “Series 2006 COPs”) and the transactions contemplated thereby.

2. The aggregate principal balance outstanding on the Series 2005 COPs and the Series 2006 COPs is \$1,451,905,000, plus interest accrued and unpaid since December 16, 2012 to the petition date.¹

3. The Limited Objection relates to the *Motion of Debtor, Pursuant to Sections 102(1)(A) and 105(a) of the Bankruptcy Code and Rules 2002(m) and 9007 of the Federal Rules of Bankruptcy Procedure, for Entry of an Order Establishing Case Management and Scheduling* [Docket No. 39] (the “Case Procedures Motion”). The Trustee hereby joins in the assertions, contentions and arguments set forth in the Limited Objection, and reserves the right to be heard on all matters in connection with the Case Procedures Motion.

¹ See *Declaration of Gaurav Malhotra in Support of City of Detroit, Michigan’s Statement of Qualifications Pursuant to Section 109(c) of the Bankruptcy Code* [Docket No. 12], ¶ 36.

Dated: July 22, 2013

Respectfully Submitted,

FOSTER SWIFT COLLINS & SMITH PC

/s/ Dirk H. Beckwith

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *Joinder to Limited Objection* was filed and served via the Court's electronic case filing and noticing system to all parties registered to received electronic notices in this matter this 22nd day of July, 2013.

/s/ Dirk H. Beckwith _____

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